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UNITED STATES DEPARTMENT OF COMMERCE  
National Telecommunications and  
Information Administration  
Washington, D.C. 20230

SEP 15 2004

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WT 02-8

Mr. Edmond J. Thomas  
Chief, Office of Engineering and Technology  
Federal Communications Commission  
445 12<sup>th</sup> Street, N.W.  
Washington, DC 20554

RE: *Amendment of Part 2 of the Commission's Rules to Allocate Spectrum Below 3GHz for Mobile and Fixed Services to Support the Introduction of New Advanced Wireless Services, Including Third Generation Wireless Systems*, Fourth Notice of Proposed Rulemaking, WT Docket No. 02-8, FCC 03-134, released July 7, 2003

Dear Mr. Thomas:

The National Telecommunications and Information Administration (NTIA), an Executive Branch agency within the Department of Commerce, manages and authorizes the Federal Government's use of the radio frequency spectrum. The Federal Communications Commission released the above referenced document on July 7, 2003, seeking comments and reply comments regarding the Amendment of Part 2 of the Commissions' Rules to Allocate Spectrum Below 3 GHz for Mobile and Fixed Services to Support the Introduction of New Advanced Wireless Services, Including Third Generation Wireless Systems. NTIA submits the following views on the above-referenced document.

**Paragraph 26, Footnote US 346.** The NTIA provides the following corrections to antenna coordinates for the 11 military satellite control uplink facilities provided in US 346. These corrections were provided by the Department of Defense (DOD).

**Corrections for Coordinates of DoD Military Satellite Control Stations**

Site/Facility Name	4 <sup>th</sup> 3G NPRM Coordinates		Corrected Coordinates	
1. Naval Satellite Control Network, Prospect Harbor, ME	44° 24' 55" N	068° 00' 50" W	44°24'16"N	068°00'46"W
2. New Hampshire Tracking Station, New Boston AFS, NH	42° 56' 52" N	071° 37' 37" W	42°56'52"N	071°37'36"W
3. Eastern Vehicle Check-out Facility & GPS Ground Antenna & Monitoring Station, Cape Canaveral, FL	28° 29' 10" N	080° 34' 34" W	28°29'09"N	80°34'33"W

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4. Buckley AFB, CO	39° 42' 55" N	104° 46' 29" W	39°42'55"N	104°46'36"W
5. Colorado Tracking Station, Schriever AFB, CO	38° 48' 21" N	104° 03' 43" W	38°48'21"N	104°31'43"W
6. Kirtland AFB, NM	35° 03' 00" N	106° 24' 00" W	34°59'46"N	106°30'28"W
7. Camp Parks Communications Annex, Pleasanton, CA	37° 44' 00" N	121° 52' 00" W	37°43'51"N	121°52'50"W
8. Naval Satellite Control Network, Laguna Peak, CA	34° 06' 55" N	119° 04' 50" W	34°06'31"N	119°03'53"W
9. Vandenberg Tracking Station, Vandenberg AFB, CA	34° 49' 24" N	120° 31' 54" W	34°49'21"N	120°30'07"W
10. Hawaii Tracking Station, Kaena Pt, Oahu, HI	21° 33' 48" N	158° 14' 54" W	21°33'44"N	158°14'31"W
11. Guam Tracking Station, Anderson AFB	13° 36' 48" N	144° 51' 12" E	13°36'54"N	144°51'18"W

**Paragraph 31.** The Commission sought comment on coordination procedures that can be implemented which will ensure that both fixed and mobile Broadcast Auxiliary Service (BAS) stations are adequately protected and accommodate the introduction of Federal earth stations in this band. To ensure that the right of protection of first-licensed facilities is sufficiently maintained, NTIA believes that it is necessary to ensure that a long period of time has not elapsed between the authorization and the commencement of operations of a DOD TT&C uplink earth station at 2 GHz. As a result, NTIA recommends that DOD must coordinate facilities at the 11 sites only when construction and/or implementation of an earth station are anticipated. NTIA recommends that to ensure that such coordination occurs successfully, prior to authorization, DOD must coordinate the DOD TT&C uplink earth station with all potentially affected incumbent BAS, Cable Television Rely Service (CARS), and Local Television Transmission Service (LTTS) licensees of stations within the coordination contour of the earth station, consistent with Appendix 7 of the ITU Radio Regulations, and engage the local BAS frequency coordinator(s), where available, in support of achieving such coordination. Furthermore, the DOD, at the time it submits its application for the authorization of a 2 GHz earth station to the Commission through NTIA's FAS, must provide, with its application, a list of the entities with which coordination was undertaken. For those unique instances where no reasonable coordination can be negotiated, the issue may require the FCC and NTIA to jointly arbitrate resolution. Once the DOD TT&C uplink earth station has begun coordination, new BAS, CARS, and LTTS stations for which coordination begins later must accept interference from the military earth station, as is normally the case for new stations sharing spectrum on a co-primary basis. Finally, to ensure that future BAS, CARS, and LTTS licensees have a means for coordinating their proposed operations with the DOD TT&C uplink earth station, DOD earth stations must maintain a point of contact for coordination.

**Paragraph 36.** The Commission sought comments on whether the Federal Government's unwanted emission limitations is sufficient to protect out-of-band (OOB) operations, or whether TT&C earth station emissions limitations outside the 2025-2110 MHz band should be further limited. Noting that the future adjacent band operators will know where these DoD earth stations are located, NTIA feel that earth stations' compliance with the OOB limits in the *NTIA Manual of Regulations and Procedures for the Federal Radio Frequency Management* should provide adequate protection to out-of-band users. While Motorola mentioned the possibly of formal coordination procedures being required<sup>1</sup>, NTIA believes that the current rules mentioned above are sufficient and, as a result, no coordination procedures are necessary.

NTIA looks forward to working with the FCC on this item. If you have any questions regarding these reply comments, please contact Gary Patrick, Spectrum Engineering and Analysis Division, of my staff at (202) 482-9132.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fredrick R. Wentland', written over a horizontal line.

Fredrick R. Wentland  
Associate Administrator  
Office of Spectrum Management

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<sup>1</sup> See Motorola Comments filed November 3, 2003, page 5.

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